

# Attachment 1

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-md-03047-YGR

MDL No. 3047

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This Document Relates to:

ALL ACTIONS

**STATE ATTORNEYS GENERAL'S FIRST  
SET OF REQUESTS FOR ADMISSION TO  
THE META DEFENDANTS**

**PROPOUNDING PARTY:** State Attorney General Plaintiffs

**RESPONDING PARTIES:** Defendants Meta Platforms, Inc., Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC

**SET:** 1

**DATE OF SERVICE:** February 14, 2025

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, the State Attorney General Plaintiffs, through the undersigned counsel, propound the following Requests for Admission on Defendants Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc., and Meta Platforms Technologies, LLC (collectively “Meta Defendants”). Responses to these Requests for Admission, or objections in lieu thereof, shall be served within 30 days after service of this document and in accordance with the definitions and instructions below.

# **I. DEFINITIONS**

1. **“Child”** or **“Children”** means individual(s) under the age of thirteen (13).

2. **“Facebook Platform”** or **“Facebook”** means any version of the Facebook platform made available for use, including versions for use on mobile devices or by accessing a URL on the internet, with or without logging into an account, and including all features or surfaces accessible to some or all users of the platform.

3. **“Instagram Platform”** or **“Instagram”** means any version of the Instagram platform made available for use, including versions for use on mobile devices or by accessing a URL on the internet, with or without logging into an account, and including all features or surfaces accessible to some or all users of the platform.

4. **“Personal information”** has the same meaning as the term is defined in 16 CFR § 312.2.

5. **“User”** means a user of Facebook or Instagram, whether the individual has an account on either platform or not.

6. **“You,” “Your,” “Defendant,”** or **“Defendants”** means the above-named Responding Party or Parties (individually and, where applicable, collectively); each of their predecessor or successor business entities; each foreign or domestic nongovernmental or private corporation or entity with which they are commonly owned, including subsidiaries and parent corporations; each of their former or present Units; and for each of the foregoing all former or present directors, officers, members, partners, principals, employees, contractors, agents, attorneys, experts, investigators, consultants, or other persons authorized to act on their behalf.

7. **“Your Platforms”** means the Facebook and Instagram Platforms.

1       **II. RULES OF CONSTRUCTION**

2           1.       The use of the conjunctive includes the use of the disjunctive and the use of the  
3       disjunctive includes the use of the conjunctive.

4           2.       The use of the singular form of any word includes the plural, and vice versa; and the  
5       use of the masculine gender shall include the feminine and the neutral genders, and vice versa.

6           3.       The use of any tense of any verb shall also include within its meaning all other tenses  
7       of the verb.

8           4.       A term or word defined herein is meant to include both the lower and upper case  
9       reference to such term or word.

10       **III. INSTRUCTIONS**

11           1.       Each matter contained herein shall be deemed admitted unless Plaintiffs receive a  
12       written answer or objection to each Request, signed by counsel, within thirty (30) days after service  
13       of these Requests.

14           2.       If You deny, or refuse to admit, any Request, in whole or in part, You must “state  
15       in detail why [You] cannot truthfully admit or deny” the Request, in accordance with Rule 36(a)(4)  
16       of the Federal Rules of Civil Procedure.

17           3.       You may not give lack of information or knowledge as a reason for Your failure to  
18       admit or deny a request unless You state that You have made reasonable inquiry and that the  
19       information known or readily obtainable by You is insufficient to enable You to admit or deny the  
20       admission requested. Fed. R. Civ. P. 36(a)(4).

21           4.       You may not object to a Request on grounds that the matter for which an admission  
22       is requested presents a genuine issue for trial.

23           5.       Unless otherwise indicated, the relevant time period for the information sought is  
24       2012 to the present (“Relevant Time Period”).

1 **IV. REQUESTS FOR ADMISSION**

2  
3 **REQUEST NO. 9.**

4 Admit that you collect personal information from persons who visit Facebook or  
5 Instagram pages without having logged into a Facebook or Instagram account.

6 **RESPONSE:**  
7

8 **REQUEST NO. 10.**

9 Admit that you collect personal information from users who use Facebook and Instagram  
10 while logged in to their accounts.

11 **RESPONSE:**  
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13 **REQUEST NO. 11.**

14 Admit that Facebook and/or Instagram accounts linked together through the Linked  
15 Accounts feature belong to the same individual user.

16 **RESPONSE:**  
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18 **REQUEST NO. 12.**

19 Admit that Facebook and/or Instagram accounts linked together through the Accounts  
20 Center feature belong to the same individual user.

21 **RESPONSE:**  
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23 **REQUEST NO. 13.**

24 Admit that each Facebook and/or Instagram account that is hard-linked to other accounts  
25 belongs to the same individual user as the accounts to which it is hard-linked.

26 **RESPONSE:**  
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**REQUEST NO. 14.**

Admit that Facebook and/or Instagram accounts that you connect using “soft-match” techniques likely belong to the same individual user.

**RESPONSE:**

**REQUEST NO. 15.**

Admit that Facebook and/or Instagram accounts that you connect using “soft-match” techniques belong to the same individual user.

**RESPONSE:**

**REQUEST NO. 16.**

Admit that you use personal information collected from users of your Platforms to develop, train, or validate algorithms or models.

**RESPONSE:**

**REQUEST NO. 17.**

Admit that, when you identify a user as likely being a Child and schedule the user’s data for deletion, you do not determine whether the user’s data was used to develop, train, or validate any of your algorithms or models.

**RESPONSE:**

Dated: February 14, 2025

/s/ Joshua Olszewski-Jubelirer

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served via electronic mail on February 14, 2025 to Counsel for Defendants Meta Platforms, Inc., Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC:

MetaNoticeofService@cov.com

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Dated: February 14, 2025

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